# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,		)	
		)	
	Plaintiff,	)	
		)	
vs.		)	CRIMINAL NO. 15-CR-30176-DRH
		)	
HAMZA L. NIJMEH,		)	
		)	
	Defendant.	)	

## **Elements of Offense Charged: Count 1- Distribution of Child Pornography**

- 1. On or about August 15, 2015, the defendant knowingly received a computer image file entitled 63ce8364ab78963deb3f16fc062f1b59.JPG;
  - 2. Image file 63ce8364ab78963deb3f16fc062f1b59.JPG contained child pornography;
- 3. The defendant knew that one or more persons depicted in image file 63ce8364ab78963deb3f16fc062f1b59.JPG was under the age of eighteen years, and;
  - 4. Image file *63ce8364ab78963deb3f16fc062f1b59.JPG* was shipped in interstate commerce.

#### Penalties for 2252A(2)(B)&(b)

Not less than 5 years up to 20 years imprisonment, a \$250,000 fine, or both; not less than 5 years supervised release; \$100 special assessment.

#### Elements of Offense Charged: Count 2- Receipt of Child Pornography

- 1. On or about August 14, 2015, the defendant knowingly received a computer image file entitled 12f5223e9973ceabcaafe6bd0a87d142.JPG;
  - 2. Image file 12f5223e9973ceabcaafe6bd0a87d142.JPG contained child pornography;

- 3. The defendant knew that one or more persons depicted in image file 12f5223e9973ceabcaafe6bd0a87d142.JPG was under the age of eighteen years, and;
  - 4. Image file 12f5223e9973ceabcaafe6bd0a87d142.JPG was shipped in interstate commerce.

### **Penalties for 2252A(2)(B)&(b)**

Not less than 5 years up to 20 years imprisonment, a \$250,000 fine, or both; not less than 5 years supervised release; \$100 special assessment.

Respectfully submitted,

DONALD S. BOYCE United States Attorney

s/Christopher R. Hoell
CHRISTOPHER R. HOELL
Assistant United States Attorney
Nine Executive Drive
Fairview Heights, IL 62208
(618) 628-3700
Fax: (618) 628-3730

E-mail: Christopher.Hoell@usdoj.gov